

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

I, Alice Wu, hereby declare as follows:

1. I have been an employee of Google Inc. (“Google” or the “Company”) since February 2006. I am an Ads Policy Manager at YouTube, focusing on issues related to advertising policy. I have been in this role for over five years. I was previously a Legal Specialist in Google’s Legal Removals team for three years. This declaration is based on my personal knowledge, review of relevant Google and YouTube business records, and conversations with other Google and YouTube personnel, and I am competent to so testify if called upon as a witness.

Attorney General Jim Hood and the Subpoena Served on October 27, 2014

2. I understand that the Attorney General has made a series of complaints and threats of prosecution related to the presence of advertisements appearing alongside certain types of YouTube videos.

3. Google uses sophisticated algorithms that review the metadata associated with YouTube videos and classifies the videos as falling into one of more than 1,500 subject matter categories (e.g., sports, comedy). Google uses these classifications for various purposes, including to determine whether advertising should run against the video.

4. In light of the Attorney General's repeated complaints and threats of prosecution, Google blocked advertisements on YouTube videos classified under the category "health and pharmacy." Google did so because it was one practical way to minimize the chance that advertising would run against videos promoting rogue pharmacies, which the Attorney General had asserted could subject Google to criminal liability. As a result, Google is no longer running any advertisements alongside YouTube videos that receive the "health and pharmacy" classification.

5. For example, Google is currently blocking advertisements from running alongside the YouTube video entitled "Nutrition Tips for Healthy Living : Foods That Give You Heartburn." A true and correct screen shot of the video, as it appeared as of January 16, 2015 at <https://www.youtube.com/watch?v=yxa6g0oArbI>, is attached hereto as Exhibit 1.

6. Google is also currently blocking advertisements from running alongside the YouTube video entitled "Healthy Break – Complete Sleep." A true and correct screen shot of the video, as it appeared as of January 16, 2015 at <https://www.youtube.com/watch?v=TbsOAm6Vcpk>, is attached hereto as Exhibit 2.

7. Google is also currently blocking advertisements from running alongside the YouTube video entitled "Cooking Dinner with Healthy ingredients we bought at Duane Read \$16 for a meal of four!" A true and correct screen shot of the video, as it appeared as of January

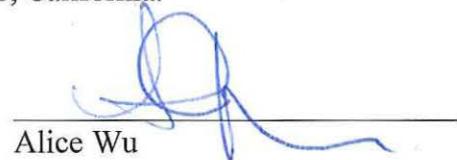
16, 2015 at <https://www.youtube.com/watch?v=EMOg1PSagtW>, is attached hereto as Exhibit 3.

8. Google is also currently blocking advertisements from running alongside the YouTube video entitled “Portsmouth’s Healthy Living Pharmacy Journey.” A true and correct screen shot of the video, as it appeared as of January 16, 2015 at <https://www.youtube.com/watch?v=w5xyOJg9Ak0>, is attached hereto as Exhibit 4.

9. The Attorney General’s threats to bring legal action against Google if it did not restrict certain content were an important factor in the decision to algorithmically prevent advertising from running alongside the aforementioned videos (and many others), which YouTube makes available to the public free-of-charge.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 21, 2015, in San Bruno, California.

A handwritten signature in blue ink, appearing to read "Alice Wu", is written over a horizontal line.

Nutrition Tips for Healthy Living : Foods That Give You Heartburn

x
yxa6g0oArbI



Y	G	PG	T	MA	X

Health/Health Conditions/GERD & Digestive Disorders [638]
Health/Pharmacy/Drugs & Medications [646]
Health [45]
Health/Alternative & Natural Medicine [499]

BLOCK ADS ALLOW ADS

Override Verticals

503 views. Uploaded 2008-11-07 by eHow. +
Monetization override by Batch.

Thumbnail: G TEEN MATURE X

Wu Decl.
Ex. 1

Healthy Break - Complete Sleep

TbsOAm6Vcpk



Y	G	PG	T	MA	X

Home & Garden [11]

Health/Nutrition/Vitamins & Supplements [237]

Health/Pharmacy [248]

Science/Chemistry [505]

BLOCK ADS ALLOW ADS

Override Verticals

50 views. Uploaded 2012-08-07 by Silver Spoon Productions. +
Monetization override by Batch.

Thumbnail: G TEEN MATURE X

Wu Decl.
Ex. 2

Cooking Dinner with Healthy ingredients we bought at Duane Reade \$16 for a meal for four!

EMOg1PSagtw



Y	G	PG	T	MA	X	BLOCK ADS ✓	ALLOW ADS
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Food & Drink [71]
Home & Garden [11]
Food & Drink/Cooking & Recipes [122]
Arts & Entertainment [3]
Health/Pharmacy [248]

34 views. Uploaded 2012-01-03 by [Melissa Chapman](#).
Monetization override by Batch.

[Override Verticals](#)

Thumbnail: [G](#) [TEEN](#) [MATURE](#) [X](#)

Wu Decl.
Ex. 3

Portsmouth's Healthy Living Pharmacy Journey

w5xyOJg9Ak0 



Y	G	PG	T	MA	X	BLOCK ADS ✓	ALLOW ADS
Jobs & Education/Education/Colleges & Universities [372]							
Health/Pharmacy [248]							

122 views. Uploaded 2014-02-04 by Pharmacy Voice. 
Monetization override by Batch.

Override Verticals

Thumbnail: G TEEN MATURE X

Wu Decl.
Ex. 4